1 2 3 4 5 6	NICHOLAS A. TRUTANICH, NSBN 13644 United States Attorney District of Nevada TINA NAICKER, CSBN 252766 Special Assistant United States Attorney 160 Spear Street, Suite 800 San Francisco, California 94105 Telephone: (415) 268-5611 Facsimile: (415) 744-0134 E-Mail: Tina.Naicker@SSA.gov Attorneys for Defendant		
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10	UNITED STATES DISTRICT COURT		
11	DISTRICT OF NEVADA		
12	THERESE C. BORJA Plaintiff,	Case No. 2:20-cv-00670-BNW	
13	vs.	JOINT STIPULATION AND [PROPOSED]	
14	ANDREW SAUL,	ORDER FOR EXTENSION OF TIME TO FILE CROSS-MOTION TO AFFIRM AND/OR RESPOND TO PLAINITFF'S MOTION FOR	
15 16	Commissioner of Social Security,  Defendant	REMAND. (First Request)	
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18	IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that		
19	the time for responding to Plaintiff's Motion for Remand be extended from February 1, 2021 to		
20			
21	February 15, 2021. This is Defendant's first request for extension. Good cause exists to grant		
22	Defendant's request for extension. Despite diligent attempts to finalize Defendant's response, Counsel		
23	for Defendant (Counsel) is having a severe migraine which affects her vision on the date of the filing		
24	deadline. In addition, Counsel has over 100+ active social security matters, in various stages of		
25	litigation and 9 dispositive motions due this month. Due to unexpected illness and leave, Counsel		
26	needs additional time to adequately review the t	ranscript and properly respond to Plaintiff's Motion	
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1	for Remand. The parties further stipulate that the Court's Scheduling Order shall be modified		
2	accordingly. Defendant makes this request in good faith with no intention to unduly delay the		
3	proceedings. Counsel apologizes for the belated request, but made her request as soon as reasonably		
4			-
5	practicable following her leave.		
6	Respectfully submitted,		
7			Respectfully submitted,
8	Dated: February 1, 2021		/s/ Marc Kalagian
9			(*as authorized by email on February 1, 2021) MARC KALAGIAN
10			Attorney for Plaintiff
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12	Dated: February 1, 2021		NICHOLAS A. TRUTANICH
13			United States Attorney DEBORAH LEE STACHEL
14			Regional Chief Counsel, Region IX
15			Social Security Administration
16		By	/s/ Tina L. Naicker
17		2)	TINA L. NAICKER
			Special Assistant U.S. Attorney Attorneys for Defendant
18			ORDER
19			ORDER
20	APPROVED AND SO ORDERED:		
21	2/8/2021		Darbweken
22	DATED:	-	THE HONORABLE BRENDA WEKSLER
23			UNITED STATES MAGISTRATE JUDGE
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